

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:
ALL OPT OUT ACTIONS

Hon. Anita B. Brody

DECLARATION OF DOUGLAS M. BURNS

DOUGLAS M. BURNS declares pursuant to 28 U.S.C § 1746:

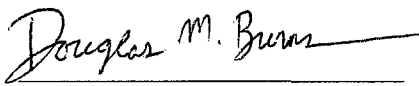
1. I am an associate at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP ("Paul, Weiss"), counsel to Defendants, National Football League and NFL Properties LLC, in *In re National Football League Players' Concussion Injury Litigation*, MDL No. 2323 (E.D. Pa.). I respectfully submit this declaration in support of the National Football League's and NFL Properties LLC's Memorandum of Law in Opposition to Plaintiffs' Motion (ECF No. 7557) for Leave to File Second Amended Master Administrative Long-Form Complaint.

2. Attached as Exhibit A is a true and correct copy of the Arbitration Opinion and Award of Richard R. Kasher, Arbitrator, dated January 22, 1988, in the arbitration *Nat'l Football League Mgmt. Council & Miami Dolphins v. Nat'l Football League Players' Ass'n & Henderson*.

3. Attached as Exhibit B is a true and correct copy of the Opinion and Decision of Sam Kagel, Arbitrator, dated July 28, 1988, in the arbitration *Nat'l Football League Players' Ass'n ex rel. Sampson v. Nat'l Football League Mgmt. Council ex rel. Houston Oilers*.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
May 26, 2017



Douglas M. Burns